

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
v.	§	<b>CRIMINAL NO. H-15-654-2</b>
	§	
	§	
<b>ABRAHAM JOSE SHIERA</b>	§	
<b>BASTIDAS</b>	§	

**DEFENDANT’S UNOPPOSED MOTION TO FURTHER  
ENLARGE HIS SURRENDER DATE**

Defendant, Abraham Jose Shiera Bastidas (“Mr. Shiera”), by and through his undersigned counsel, hereby respectfully submits his Unopposed Motion to Further Enlarge His Surrender Date. In support thereof, Mr. Shiera states:

1. Mr. Shiera was sentenced by this Court at his October 13, 2022 sentencing hearing. His Judgment in his criminal case [Dkt. 282] was entered on October 17, 2022.
2. This Court sentenced Mr. Shiera to a custodial term of 12 months and a day.
3. On November 7, 2022, the Court entered its order notifying Mr. Shiera that he was designated to the Bureau of Prisons (BOP) FCI Miami Low facility in Miami, Florida. [Dkt. 287] Per the order, his original surrender date was November 29, 2022 at 2 p.m.

4. Mr. Shiera did not anticipate such a speedy designation and surrender date. On November 14, 2022, he filed his Unopposed Motion to Enlarge His Surrender Date seeking a 45-day enlargement of his surrender date until January 13, 2023. [D.E. 290]. This Court granted that Motion on November 16, 2022 [DE 291].

5. Mr. Shiera respectfully requests a further 45-day enlargement of his surrender date to February 27, 2023 for the following reasons:

a. Mr. Shiera still needs additional time to put his financial affairs in order. He continues the process of selling now multiple properties to pay certain longstanding financial obligations. Due to the holidays and the need to list and sell additional other properties, he needs time to facilitate those transactions to pay his attorneys and ensure additional financial resources for his family during his incarceration.

b. Now that he has been sentenced, Mr. Shiera's civil litigation, which in part had been stayed/suspended pending his sentencing, requires his attention. He anticipates meetings to further the status of that litigation and address certain civil litigation needs prior to his incarceration, including engaging counsel to assist in some of his civil litigation matters. Mr. Shiera needs additional time to do so and an additional 45-day enlargement would greatly assist in that effort.

6. Undersigned counsel for Mr. Shiera has conferred with Department of Justice Assistant Chief Sonali Patel, who has confirmed that the Government does not oppose this Motion.

WHEREFORE, for the foregoing reasons and for good cause shown, Defendant Abraham Shiera respectfully requests that this Court enlarge his surrender date to the BOP until February 27, 2023 at 2 p.m.

Dated: January 5, 2023

Respectfully submitted,

/s/ Constantine Z. Pamphilis

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### **CERTIFICATE OF CONFERENCE**

I certify that Counsel for Mr. Shiera has conferred with Department of Justice Assistant Chief Sonali Patel, who confirmed that the Government does not oppose the relief requested by Mr. Shiera in the foregoing motion.

/s/ Ann M. St. Peter-Griffith  
Ann M. St. Peter-Griffith

### **CERTIFICATE OF SERVICE**

I hereby certify that, on January 5, 2023, I electronically filed the foregoing motion with the Clerk of the Court using the ECF/CM system and served the foregoing motion by electronic mail on counsel for the United States.

/s/ Ann M. St. Peter-Griffith  
Ann M. St. Peter-Griffith